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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KIM L. WILSON,

Plaintiff,

vs.

CAROLYN COLVIN,
Acting Commissioner of Social Security,¹

Defendant.

Case 2:24-cv-01633-DJA

UNOPPOSED MOTION FOR
EXTENSION OF TIME
(*FIRST REQUEST*)

Defendant, the Commissioner of Social Security, respectfully requests an extension of 30 days in which to respond to Plaintiff's Brief (ECF No. 15), filed on December 3, 2024, changing the date on which Defendant's response is due to from January 2, 2025, to February 3, 2025. This is Defendant's first request for an extension to respond to Plaintiff's motion. Counsel for Defendant conferred with a representative for counsel for Plaintiff on December 31, 2024, and confirmed that Plaintiff has no objection to this request.

¹ Carolyn Colvin became the Acting Commissioner of Social Security on November 30, 2024. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Carolyn Colvin should be substituted for Martin O'Malley as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 Defendant makes this request in good faith and for good cause. I request this extension in
2 order to further consider the administrative record in light of the issues raised in Plaintiff's motion.
3 While I have been diligently trying to complete the review of this case file, I additionally have had
4 several briefs due in recent days in this and other district courts. In the next month, I have seven
5 more briefs due in various district courts of the Ninth Circuit, including this one. Accordingly, I
6 ask the Court for more time so that I can properly represent the Commissioner in this and my other
7 matters.

8 For these reasons, the Commissioner respectfully requests that the Court grant this motion
9 for an extension of 30 days for Defendant to respond to Plaintiff's Opening Brief.

10 DATED December 31, 2024.

Respectfully submitted,

11 JASON M. FRIERSON
12 United States Attorney

13 s/ Julie A.K. Cummings
14 JULIE A.K. CUMMINGS
15 Special Assistant United States Attorney
16 Office of Program Litigation, Office 7

17 Attorneys for Defendant

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20 IT IS SO ORDERED:

21 
22 HON. DANIEL J. ALBREGTS
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 1/2/2025
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